

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CENTER FOR WORKPLACE
COMPLIANCE (f/k/a EQUAL
EMPLOYMENT ADVISORY COUNCIL),

Plaintiffs,

v.

LITTLER MENDELSON, P.C., LANCE E.
GIBBONS, THERESA GOKTURK (a/k/a
CHRIS GOKTURK), and DOE
DEFENDANTS 1-10, INCLUSIVE,

Defendants.

Civil Action No. 1:20-cv-1387; AJT JFA

**DEFENDANTS AND COUNTERCLAIMANTS LITTLER MENDELSON, P.C.,
THERESA GOKTURK, AND LANCE E. GIBBONS'
MOTION FOR ENTRY OF PROTECTIVE ORDER**

Defendants and Counterclaimants Littler Mendelson, P.C., Theresa Gokturk, and Lance Gibbons, by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 26, hereby move the Court for entry of the Proposed Protective Order, submitted herewith, for those reasons set forth in the contemporaneously filed memorandum of points and authorities.

LOCAL RULE 37(E) STATEMENT OF COUNSEL

The undersigned counsel hereby certify that the moving parties have in good faith met and conferred multiple times and at length with counsel for Plaintiff and Counterclaim Defendant Center for Workplace Compliance to resolve this dispute without the Court's Intervention.

WHEREFORE, for the reasons set forth in the accompanying memorandum,
Defendants and Counterclaimants Littler Mendelson, P.C., Theresa Gokturk, and Lance
Gibbons respectfully request that the Court enter their proposed Protective Order.

Dated: February 19, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of February 2021, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record, including:

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